

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
)	
The Use of N11 Codes and Other Abbreviated)	CC Docket No. 92-105
Dialing Arrangements)	
)	

To: The Chief, Wireline Competition Bureau

**JOINT COMMENTS OF
ALLIANCE OF INFORMATION AND REFERRAL SYSTEMS, UNITED WAY
OF AMERICA, UNITED WAY 211 (ATLANTA, GA), UNITED WAY OF
CONNECTICUT, FLORIDA ALLIANCE OF INFORMATION AND REFERRAL
SERVICES, AND THE TEXAS I&R NETWORK**

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SUMMARY

In the *211/511 Assignment Order*, the Commission determined that the 211 dialing code should be used exclusively to provide Community Information and Referral Services. In making this determination, the Commission stated that it expected “community service organizations to work cooperatively to ensure the greatest possible use of this scarce resource.” The Commission’s expectations have been met. At the time of the *211/511 Assignment Order*, in July 2000, less than five percent of the U.S. population had access to 211 services. Today, approximately 65 percent of the U.S. population has access to these vital services. Usage continues to increase. In 2006, 211 Centers answered an estimated eight million calls. The Information and Referral Service Petitioners are committed to take further action that will enhance the availability and effectiveness of the service, thereby making good use of the scarce public resource that the Commission has allowed Information and Referral Service providers to use. Indeed, by the end of 2008, 80 percent of the population is expected to have 211 access. The Commission, therefore, should continue to allocate the 211 dialing code for the exclusive use of Community Information and Referral Services.

As the Commission anticipated, Community Information and Referral Service providers have worked cooperatively with state and local government agencies to make the most efficient use of the 211 dialing code. For example, the United Way of Vermont 211 has forged strong partnerships with numerous health and human service agencies while the 211 New Jersey Partnership has worked cooperatively with the Department of Homeland Security.

In the *211/511 Assignment Order*, the Commission also predicted that the 211 service would be a “useful adjunct” to the existing 911 and 311 services. The most recent 211 system-wide survey, conducted by United Way of America, confirms that this expectation has been met.

211 Centers have provided a range of services that complement, but do not duplicate, the important services provided by 911 and 311 Centers. The continued growth of 211 will result in more efficient use of 911 services, as callers who have serious human needs, but who do not require emergency assistance, migrate from 911 to 211.

In the *211/511 Assignment Order*, the Commission noted the potential of 211 to contribute to the “national safety network.” Events since then have demonstrated that, if anything, the potential of 211 to contribute to public safety and homeland security is even greater than the Commission anticipated in 2000. For example, during the Hurricane Katrina and Hurricane Rita disasters of 2005, the 211 Centers played a significant role in providing assistance to victims. As a result, in its follow-up report, FEMA strongly recommended that states expeditiously move forward on statewide 211 implementation.

The assignment of the 211 dial code to Community Information and Referral Services has provided additional benefits. For example, in some communities, 211 serves as a key entry point to Aging Information and Assistance, Child Care Resource and Referral, crisis lines and other forms of community information services.

The Information and Referral Service Petitioners intend to take further actions that will enhance the availability and effectiveness of the service. For example, once 211 is available to 80 percent of the population, the Information and Referral Petitioners, in conjunction with other 211 providers, intend to conduct a national advertising campaign. The Petitioners also are committed to working cooperatively with wireless, VoIP, and cable telephony providers to continue to expand access to 211 services. The Information and Referral Petitioners welcome the opportunity to work with the Commission to determine additional ways to further expand the availability of 211 services.

TABLE OF CONTENTS

INTRODUCTION	1
STATEMENT OF INTEREST.....	3
I. THE 211 CODE IS BEING WIDELY USED TO PROVIDE COMMUNITY INFORMATION AND REFERRAL SERVICES, THEREBY PROVIDING SIGNIFICANT PUBLIC INTEREST BENEFITS.....	5
A. The 211 Code has been Deployed Quickly, and is Now Being Used to Provide Services in Numerous Locations Across the County	5
B. Community Information and Referral Service Providers Have Worked Cooperatively With State and Local Government Agencies	6
C. 211 Service has Become a “Useful Adjunct” to 911 and 311 Services.....	8
D. Assignment of the 211 Dialing Code to Community Information and Referral Services has Enhanced Public Safety and Homeland Security	10
E. Assignment of the 211 Dialing Code to Community Information and Referral Services has Provided Additional Benefits.....	11
II. THE REFERRAL AND INFORMATION SERVICE PETITIONERS ANTICIPATE THAT, IN THE YEARS TO COME, USE OF THE 211 DIALING CODE WILL CONTINUE TO GROW	12
CONCLUSION.....	14
ATTACHMENTS	
1. List of Operational 211 Call Centers (2007)	
2. Map of Operational 211 Call Centers and 211 Statistical Data (2007)	
3. Alliance of Information and Referral Services, 211 Calls in 2006 (2007)	
4. 211 Endorsements	
5. United Way, 211 Ten Years After (2007) (Excerpts)	
6. Ray Marshall Center for the Study of Human Resources, “National Benefit/Cost Analysis of Three-Digit Telephone Information and Referral Service” (2004)	
7. United Way & Alliance of Information and Referral Systems, “Trial By Wind and Water: How 211 Played a Vital Role During the 2004 Florida Hurricanes” (2004)	

8. Federal Emergency Management Agency, “FEMA Recovery Division 2005 Hurricane Season After-Action Report” (2006) (Excerpts)
9. Selected State Commission Orders Regarding 211 Access
 - a. Oklahoma
 - b. Massachusetts
 - c. Maine
 - d. New Hampshire
 - e. Indiana
 - f. New York
 - g. Vermont

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CONNECTICUT, FLORIDA ALLIANCE OF INFORMATION AND REFERRAL
SERVICES, AND THE TEXAS I&R NETWORK**

Pursuant to the Public Notice issued by the Federal Communications Commission,¹ the Alliance of Information and Referral Systems, United Way of America, United Way 211 (Atlanta, GA), United Way of Connecticut, the Florida Alliance of Information and Referral Services, and the Texas I&R Network (“Information and Referral Petitioners”),² hereby submit these comments.

INTRODUCTION

On April 28, 1998, the Information and Referral Petitioners submitted a petition requesting the assignment of the 211 abbreviated dialing code for Community Information and Referral Services. In support of their request, the Information and

¹ Comments Sought on Designation of 211 and 511 as Abbreviated Dialing Codes, CC Docket 92-105, *Public Notice*, DA 07-2017 (rel. May 7, 2007) (“*Public Notice*”).

² These organizations were the original parties to the petition filed in 1998 seeking assignment of the 211 Code for Information and Referral (“I&R”) Services. *See* Request of Alliance of Information and Referral Systems, United Way of America, United Way 211 (Atlanta, GA), United Way of Connecticut, the Florida Alliance of Information and Referral Services, and the Texas I&R Network, NSD-L-98-80 (filed May 28, 1998) (“*211 Petition*”). In preparing these comments, the 211 Petitioners consulted numerous other parties, including representatives from the 211 Leadership Council, statewide 211 organizations and 211 Centers.

Referral Petitioners stated that, “if assigned for this purpose, the 211 dialing code will be pressed into service quickly and effectively in many jurisdictions.”³ In July 2000, the FCC released the *211/511 Assignment Order*, which granted the Information and Referral Petitioners’ request. In making this assignment, the Commission stated that it expected “community service organizations to work cooperatively to ensure the greatest possible use of this scarce resource.”⁴ The Commission further indicated that, five years after the effective date of the original order, it would examine “whether the resource is being utilized in the manner and to the extent anticipated by the Information and Referral Petitioners.”⁵ Pursuant to the *211/511 Assignment Order*, on May 7, 2007, the Commission released a Public Notice seeking comments on “the status of 211 and 511 implementation to determine whether 211 and 511 dialing codes are being utilized in the manner for which they were assigned.”⁶

As demonstrated below, the Information and Referral Petitioners, and other I&R providers, have worked cooperatively to ensure the greatest possible use of the scarce resources that the Commission has allowed them to use. The Information and Referral Petitioners are taking concrete steps to ensure that, in the years to come, use of the 211 dialing code will continue to grow, thereby providing even greater public interest

³ *Id.* at 13-14.

⁴ Petition by the United States Department of Transportation for Assignment of an Abbreviated Dialing Code (N11) to Access Intelligent Transportation System (ITS) Services Nationwide; Request by the Alliance of Information and Referral Systems, United Way of America, United Way 211 (Atlanta, Georgia), United Way of Connecticut, Florida Alliance of Information and Referral Services, Inc., and Texas I&R Network for Assignment of 211 Dialing Code; The Use of N11 Codes and Other Abbreviated Dialing Arrangements, NSD-L-99-24; NSD-L-98-80; CC Docket No. 92-105, *Third Report and Order and Order on Reconsideration*, 15 FCC Rcd 16753, 16766 (¶ 21) (2000) (“*211/511 Assignment Order*”).

⁵ *Id.*

⁶ *Public Notice*, *supra* n.1, at 1.

benefits. The Commission, therefore, should continue to allocate the 211 dialing code for the exclusive use of Community Information and Referral Services.

STATEMENT OF INTEREST

The Information and Referral Petitioners consist of the six entities that submitted the original petition on April 28, 1998, which sought assignment of the 211 dialing code for Community Information and Referral Services.

The Alliance of Information and Referral Systems (“AIRS”). Incorporated in Arizona in 1973, AIRS is a non-profit organization supporting more than 1,000 member Information and Referral agencies, whose primary mission is connecting people to valuable human services. AIRS also supports 28 state and regional affiliate organizations, and participates in critical partnerships with the United Way of America, the National Association of State Units on Aging, the National Emergency Number Association, the American Association of Suicidology and InformCanada. AIRS promotes service quality and conveys new developments in the field through its publications and national networking. AIRS promulgates national standards for information and referral services and provides credentialing services for the field, offering professional development training and networking opportunities.

United Way of America. United Way is a national network of 1,300 local organizations that work to create lasting positive changes in communities and people’s lives by addressing, at the local level, the underlying causes of the most significant social problems. United Way of America, organized in the State of New York on June 25, 1970, is the national organization dedicated to leading the United Way movement. While local United Ways tackle issues based on local needs, common areas of focus include helping

children and youth succeed, improving access to health care, promoting financial stability, and strengthening families.

United Way 211 (Atlanta, GA). United Way 211 is a non-profit organization, which was formed in 1905 as Associated Charities in the State of Georgia and serves an area constituting half the population of the State of Georgia. The Public Service Commission of Georgia assigned the 211 dialing code to United Way of Metropolitan Atlanta on May 6, 1997. United Way 211 serves thirteen counties around the Atlanta Metropolitan Area, and is dedicated to providing the public with critical human service information 24 hours a day, seven days a week.

United Way of Connecticut. The United Way of Connecticut is the state association for the 21 independent United Ways in the state. At the state level, United Way of Connecticut parallels the local work of individual United Ways by partnering with other groups to maximize the quality of human services, including the management and operation of 211 centers. In 1998, the Governor and legislature supported the use of the 211 number for health and human services resources. The number went into effect in March 1999, making Connecticut the first state in the nation to use the 211 dialing code statewide. The 211 service is a funded partnership of the Connecticut United Ways and the State of Connecticut.

The Texas Information and Referral Network. The Texas I&R Network is a public-private partnership under the leadership of the Texas Health and Human Services Commission, a state agency. The Texas I&R Network was formed in 1991 and is headquartered in Austin, Texas. The I&R Network is dedicated to building, coordinating, and publicizing a statewide network that provides local and state access points for health

and human services information in Texas. The Texas I&R Network is one of the most advanced statewide information and referral networks in the country.

The Florida Alliance of Information and Referral Services. Incorporated in November 1980, the Florida I&R Alliance seeks to provide a statewide mutual assistance network through educational and training opportunities among its membership in the delivery of information and referral services.

I. THE 211 CODE IS BEING WIDELY USED TO PROVIDE COMMUNITY INFORMATION AND REFERRAL SERVICES, THEREBY PROVIDING SIGNIFICANT PUBLIC INTEREST BENEFITS

A. The 211 Code has been Deployed Quickly, and is Now Being Used to Provide Services in Numerous Locations Across the Country

In the 211 Petition, the Information and Referral Service Petitioners stated that they anticipated that the “211 dialing code will be pressed into service quickly and efficiently,” given the “widespread interest across the country in implementing the type of central clearinghouse for community resources.”⁷ Despite the financial challenges of launching and sustaining a 211 system in the absence of any dedicated governmental funding sources, Community and Information Service Providers have fulfilled this commitment. At the time of the *211/511 Assignment Order*, in July 2000, less than five percent of the U.S. population had access to 211 services. Today, approximately 65 percent of the U.S. population has access to these vital services.⁸ Indeed, by the end of 2008, 80 percent of the population is expected to have 211 access. The Information and Referral Service Petitioners expect that number to continue to grow. New York City, St.

⁷ *211 Petition* at 13-14.

⁸ See Map of Operational 211 Call Centers and 211 Statistical Data (June 4, 2007).

Louis and the State of Arkansas expect to launch their 211 services this year. A number of other states – including Arizona, Delaware, New Hampshire, Pennsylvania and Wyoming – currently are planning statewide implementation of 211 services. Attachment One lists the 220 operational 211 Centers, by state. Attachment Two provides a map showing the locations of these Centers.

In February 2007, United Way of America and the Alliance of Information Referral Services conducted a survey of 211 centers to determine actual usage of 211 services. Based on that data, United Way and AIRS estimate that nearly *eight million* 211 calls were answered in 2006. A list of estimated calls, by state, is provided in Attachment Three.⁹ The Information and Referral Service Petitioners are confident that, as services become available in additional locations, and public awareness continues to grow, use of 211 services will continue to grow.

B. Community Information and Referral Service Providers Have Worked Cooperatively With State and Local Government Agencies

In the *211/511 Assignment Order*, the Commission noted that it expects “community service organizations to work cooperatively to ensure the greatest public use of this scarce resource.”¹⁰ The Information and Referral Service Petitioners appreciate the Commission’s flexibility in allowing communities to use 211 in a manner most appropriate for each community. As the Commission expected, Community Information and Referral Service providers have worked cooperatively with state and local government agencies to make the most efficient use of the 211 dialing code.

⁹ See Alliance of Information and Referral Systems, 211 Calls in 2006 (2007).

¹⁰ See *supra* n.4.

Indeed, from its earliest days, Community Information and Referral Service Providers developed successful public-private partnerships to make the best use of the 211 dialing code. The first cooperative efforts involved 211 providers and the States of Connecticut and Texas. Many newly formed statewide 211 collaboratives are now following their lead. For example:

- The United Ways of Vermont 211 has forged strong partnerships with the Agency on Human Services, Public Safety Aging and Disability Resource Center, Military Family and Community Network and Blueprint for Health.
- The 211 New Jersey Partnership has worked cooperatively with the Department of Homeland Security.
- The 211 New York Collaborative, supported by the legislature's appropriations through the Office of Children and Family Services, receives start-up, capital and some operating funds for 211 regions.
- The Florida Alliance of Information and Referral Services and the State of Florida's Division of Management Services created an interactive voice response solution for routing wireless 211 calls within Florida.

The use of the 211 number for Community Information and Referral Services has gained public and private sector support nationwide. A list of endorsements is provided as Attachment Four. The Information and Referral Service Petitioners anticipate that, in the years to come, additional public-private partnerships will be developed, thereby further enhancing the effective use of the 211 dialing code.

C. 211 Service has Become a “Useful Adjunct” to 911 and 311 Services

In the *211/511 Assignment Order*, the Commission predicted that the 211 service would be a “useful adjunct” to the existing 911 and 311 services.¹¹ Specifically, the Commission anticipated that assigning the 211 dialing code for Community Information

¹¹ *211/511 Assignment Order*, 15 FCC Rcd at 16766 (¶20).

and Referral Services would help “individuals facing serious threats to life, health and mental well being” who have “urgent and critical human needs that are not addressed by dialing 911 for emergency assistance or 311 for non-emergency assistance.”¹²

The most recent comprehensive 211 system-wide survey, conducted by United Way of America and AIRS in 2007, confirms that this expectation has been met. 211 Centers have provided a range of services that complement, but do not duplicate, the important services provided by 911 and 311 Centers. Although there is some regional variation, the survey indicates that, on average, of the calls handled by 211 Centers:

- 43 percent were for basic needs, such as food, housing, rent and utility assistance;
- 16 percent were requests for health and mental-health services;
- 10 percent included requests for community development and disaster services;
- 6 percent were requests for consumer services;
- 8 percent were requests for income- or employment-related services;
- 8 percent were requests for family-related services;
- 7 percent were requests for legal assistance; and
- 2 percent were for educational services.

Excerpts of this survey are appended as Attachment Five.¹³

User satisfaction is high. In interviews with individuals who had used 211 services, researchers at the University of Texas at Austin found that 93 percent of 211 callers surveyed found the information they had sought, and that 97 percent of 211 callers

¹² *Id.* at 16764 (¶18).

¹³ United Way, 211 Ten Years After, at § 2 (2007). 211 providers are moving towards a standardized Taxonomy of Human Services, which will further improve the reliability of future data.

indicated that they would avail themselves of the service again.¹⁴ The study is appended as Attachment Six.

The continued growth of 211 will result in more efficient use of 911 services, as callers who have serious human needs, but who do not require emergency assistance, migrate from 911 to 211. Indeed, the University of Texas Study found that collaboration between 211 and 911 is “promising and effective in some sites,”¹⁵ and estimated that five percent of 911 callers would migrate to 211 as the system is rolled out.¹⁶ This will have two significant benefits. First, it will allow 911 Centers to use their resources to focus on their core mission: providing emergency services, such as police, fire, and ambulance service. Second, it will allow for non-emergency services to be provided by 211 Centers for less cost.¹⁷

D. Assignment of the 211 Dialing Code to Community Information and Referral Services has Enhanced Public Safety and Homeland Security

In the *211/511 Assignment Order*, the Commission noted the potential of 211 to contribute to “a national safety network.”¹⁸ Events since then have demonstrated that, if anything, the ability of 211 to contribute to public safety and homeland security is even greater than the Commission anticipated in 2000.

¹⁴ *National Benefit/Cost Analysis of Three Digit-Accessed Telephone Information and Referral Services*. Prepared by the Ray Marshall Center for the Study of Human Resources, Lyndon B. Johnson School of Public Affairs, The University of Texas at Austin, at 23 (December 2004); *see also id.* 25-30 (describing and quantifying benefits of a nationwide 211 system.)

¹⁵ *Id.* at 29.

¹⁶ *Id.*

¹⁷ Using a cost of \$13.59 per 911 call, the study estimated the national savings of more efficient use of the 911 system at \$113 million over ten years. *Id.*

¹⁸ *211/511 Assignment Order*, 15 FCC Rcd at 16764 (¶19).

The ability of 211 to contribute to public safety became obvious when, during the September 2001 terrorist strikes on New York City, Connecticut's Governor advised state citizens who were affected by the attacks to dial 211. The Governor later structured a follow-up mental-health assistance program for victims' families using the 211 infrastructure. Since that time, States and communities have increasingly harnessed the expertise and wealth of resource information housed in a comprehensive 211 database and call center during times of disaster.

For example, a report prepared by the Civil Society Consulting Group in Washington, D.C., regarding the 2004 Florida hurricanes concluded that "211s conclusively demonstrated the significant contribution that they can make in an emergency."¹⁹ This includes: expanding the capacity of the emergency response system; managing unmet needs; reassuring callers; mobilizing and managing volunteers; serving as intake for service providers; and sustaining the critical connection to citizens. A copy of this study can be found as Attachment Seven.

Similarly, in Louisiana, following the Katrina and Rita disasters of 2005, the 211 call center in Monroe, Louisiana absorbed not only all of the calls for the state's 211 system, but also the 911 calls, after that system experienced technical problems. In its follow-up report, the Federal Emergency Management Agency ("FEMA"), recognized the accomplishments of 211 both during and in the aftermath of the hurricanes, and

¹⁹ United Way & Alliance of Information and Referral Systems, "Trial by Wind and Water: How 2-1-1 Played a Vital Role During the 2004 Florida Hurricanes," at 7.

strongly recommended that states expeditiously move forward on statewide 211 implementation. Excerpts from the FEMA Report are appended as Attachment Eight.²⁰

E. Assignment of the 211 Dialing Code to Community Information and Referral Services has Provided Additional Benefits

The assignment of the 211 dialing code to Community Information and Referral Services has provided additional benefits. 211 services have enhanced awareness and use of valuable community resources, such as the Earned Income Tax Credit, Medicare Part D campaigns, and early childhood and health access programs. Communities wishing to provide critical resources to their most vulnerable citizens have used the 211 technological infrastructure and existing call-center expertise to determine eligibility for such programs; educate the community in multiple languages about programs' features; and enhance awareness about where and how to access a program. In addition, in many communities, 211 serves as a key entry point to Aging Information and Assistance, Child Care Resource and Referral, crisis lines and other forms of community information services.

II. THE INFORMATION AND REFERRAL SERVICE PETITIONERS ANTICIPATE THAT USE OF THE 211 DIALING CODE WILL CONTINUE TO GROW

The Information and Referral Petitioners are committed to taking further concrete actions to ensure that the 211 dialing code will be used as effectively as possible.

Increased public awareness. This year marks ten years since the launch of the first 211 system, in Metropolitan Atlanta. During the last decade, 211 services have grown substantially. As awareness of 211 continues to grow, the Information and

²⁰ Federal Emergency Management Agency, "FEMA Recovery Division 2005 Hurricane Season After-Action Report," at 70 (2006).

Referral Service Petitioners are confident that usage will continue to increase. With expected launches of 211 services in New York City, St. Louis, and the State of Arkansas, the Information and Referral Petitioners anticipate that by December 31, 2008 nearly 80 percent of all Americans will have access to a local 211 service. At that point, it will be possible to conduct a cost-effective national advertising campaign. The Information and Referral Service Petitioners are committed to coordinating that effort. The Commission could further enhance public awareness by including 211 in its education and outreach initiatives through the Consumer & Governmental Affairs Bureau.

Improving access. As discussed in prior filings,²¹ Community Information and Service Providers have had to overcome some obstacles to implement 211 service. For example some telecommunication service providers have not made 211 dialing available to their customers. As 211 providers become aware that a new telecommunications provider has entered a market, they have attempted to contact the provider to initiate 211 translations. In some states, the Public Utility Commission has provided significant assistance.²² As a result, in states where 211 is active, most incumbent and competitive

²¹ See Comments of United Way and the The Alliance of Information and Referral Systems , NSD-L-98-80 and CC Docket No. 92-105, at 9 (November 19, 2004); see also Ex Parte Submission of United Way and The Alliance of Information and Referral Systems, NSD-L-98-80 and CC Docket No. 92-105 (Dec. 20, 2005).

²² See, e.g., Okla. Admin. Code § 165:55-7-2.1(d) (2007) (requiring that, upon request, a telecommunications service provider must provide 211 service within a specific geographic area or region to 211 Call Centers); Petition of Mass 211, Inc. requesting approval by the Department of Telecommunications and Energy to implement the abbreviated dialing code '211' for use as a statewide community information and referral service, D.T.E. 06-30 (Massachusetts Department of Telecommunications and Energy Aug. 25, 2006) (requiring all carriers to make necessary modifications to their switching equipment to route 211 calls); 2-1-1 Maine, Inc. Request for Designation As 211 Provider Pursuant to 35-A, Section 7108, Docket No. 2005-281 (Maine Public Utilities Commission June 27, 2005) (stating that if the authorized 211 provider has telecommunications-related implementation problems with local providers, it may bring such matters to the Commission's attention); Petition of the United Ways of New Hampshire and the New Hampshire Coalition of Comprehensive Information and Referral Services

local exchange carriers have implemented 211 “translations” (*i.e.*, call routing arrangements) when requested by a 211 provider.²³ Going forward, the Community Information and Referral Service Petitioners are committed to working cooperatively with wireless, VoIP, and cable telephony providers – as well as with the Commission – to continue to expand access to 211 services.²⁴

System building. The Petitioners will continue to work with other 211 providers, telecommunications providers, and other public and private entities to ensure the establishment of a unified, nationwide 211 system in which all 211 Centers adhere to nationally recognized standards. To do so, 211 Centers will require increased resources.

for Designation of the Coalitions as Lead Implementing Agency for 211 Services, *Order Nisi Granting Petition and Designating the New Hampshire Coalition of Comprehensive Information and Referral Services as Lead Agency for 211 Services*, DT 04-027, Order No. 24,363 (New Hampshire Public Utilities Commission Aug. 19, 2004) (ordering wireline and wireless providers to cooperate with the 211 implementing agency); Petition of Indiana 211 Partnership, Inc. to be recognized and endorsed as the proper administrator and sole authorized user in Indiana of the 211 dialing code in order to implement a state-wide, non-commercial information and referral system providing access to human service providers and to be granted certain other relief furthering such purpose, including designation as a ‘recognized 211 service provider’ within the meaning of I.C. 8-1-19.5, Cause No. 42098 (Indiana Utility Regulatory Commission June 17, 2004) (stating that if any issues arise with respect to service providers, the administrator of the 211 dialing code may “bring the issue to the attention of the Commission”); Implementation of N-1-1 Abbreviated Dialing Codes and Assignment of Vertical Service Codes, Petition of Chevra Hatzalah, Inc. for Assignment of a Vertical Service Code, *Order Denying Petition for Vertical Service Code Assessment and Directing Continued Study of N-1-1 Issues*, Case 00-C-1749 (New York Public Service Commission Feb. 7, 2002) (encouraging wireless carriers to enable their customers to complete 211 calls); Petition of the United Way’s of Vermont, pursuant to board Rule 7.300, for designation as the 2-1-1 service manager for the State of Vermont, Docket No. 7012, (Vermont Public Service Board Nov. 19, 2004) (requiring that telephone companies implement 211 translation in their switches).

²³ A 2005 Survey of 211 providers conducted by United Way and AIRS indicated that 70 percent had completed the majority of incumbent local exchange carrier translations. Half of the 211 providers reported having completed translations with most or all of competitive local exchange carriers (“CLECs”) in their geographic area, while 8 percent report having completed no translations with CLECs.

²⁴ The 2005 Survey indicated that only 14 percent of 211 providers reported having completed most or all of wireless translations, while 45 percent reported having no translations with wireless providers. 14 percent reported having completed translations with a few wireless providers. The situation appears to have improved somewhat. In 2007, 21 percent of 211 Centers reported that all individuals in their geographic coverage area could access 211 service using their mobile phones, while 21 percent of the Centers reported that few or none of the individuals in their coverage area could access the service using their mobile phones. *See* United Way, 211 Ten Years After, § 7 (Attachment Five).

The Petitioners will continue to work to secure sustainable public and private sector funding.

CONCLUSION


In the *211/511 Assignment Order*, the Commission anticipated that allocating the 211 dialing code to Community Information and Referral Service Providers would provide significant public interest benefits. As demonstrated above, the Information and Referral Service Petitioners, and other 211 providers, have worked diligently to meet – and indeed exceed – the Commission’s expectations. The Information and Referral Service Petitioners are committed to taking further action that will enhance the availability and effectiveness of the service, thereby making good use of the scarce public resource that the Commission has entrusted them to use. The Information and Referral Petitioners and other 211 leaders welcome the opportunity to work with the Commission to determine other ways to further expand the availability of 211 services.

In light of the above, the Information and Referral Service Petitioners request that the Commission continue to allocate the 211 dialing code for the exclusive use of Community Information and Referral Service Providers.

Respectfully submitted,

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